

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

---

In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

---

**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION OF  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS  
SPECIAL INSURANCE COUNSEL FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR THE PERIOD OF  
MAY 1, 2023 THROUGH MAY 31, 2023**

---

Pursuant to the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [ECF No. 117] (the "Interim Compensation Order"), Burns Bair LLP, special insurance counsel for the Official Committee of Unsecured Creditors (the "Committee"), hereby files this monthly fee statement (the "Monthly Fee Statement") seeking compensation for reasonable and necessary services rendered to the Committee from May 1, 2023 through May 31, 2023 (the "Compensation Period") in the amount of \$7,294.00 (80% of \$9,117.50).

Burns Bair LLP's invoice for the Compensation Period, attached hereto as **Exhibit A**, includes detailed time entries that describe the services performed by Burns Bair LLP professionals during the Compensation Period and a list of expenses Burns Bair LLP incurred during the Compensation Period in connection with providing services to the Committee.

[Signature page follows]

Date: June 22, 2023

/s/ Timothy W. Burns

---

Timothy W. Burns (WI State Bar #1068086)

Jesse J. Bair (WI State Bar #1083779)

10 E. Doty St., Suite 600

Madison, Wisconsin 53703-3392

Telephone: (608) 286-2808

Email: [tburns@burnsbair.com](mailto:tburns@burnsbair.com)

Email: [jbair@burnsbair.com](mailto:jbair@burnsbair.com)

*Special Insurance Counsel for the Official  
Committee of Unsecured Creditors*

**CERTIFICATE OF SERVICE**

I, Jess Rehbein, hereby certify that on June 22, 2023, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF and that service was emailed to the following parties:

- a. The Roman Catholic Diocese of Syracuse, New York, 240 East Onondaga Street,  
Syracuse, New York 13202
- b. Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202,  
Attn: Stephen A. Donato
- c. Office of the United States Trustee, 10 Broad Street, Room 105, Utica, New York  
13501, Attn: Erin P. Champion

Date: June 22, 2023

/s/ Jess Rehbein

Jess Rehbein

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 6/7/2023

**Bill # :** 01152

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2023	Nathan Kuenzi	Participate in BB team conference re case developments and projects (.1);	0.10	\$42.00
5/1/2023	Leakhena Au	Participate in BB team meeting re case developments and projects (.1);	0.10	\$42.00
5/1/2023	Timothy Burns	Conference with internal team re case assignments and strategy (.1); review correspondence from the mediator re June mediation session (.1);	0.20	\$140.00
5/1/2023	Brian Cawley	Participate in BB team meeting re case developments and projects (.1);	0.10	\$42.00
5/1/2023	Jesse Bair	Participate in BB team conference re case developments and projects (.1);	0.10	\$62.50
5/3/2023	Jesse Bair	Review Mediation Session Directive received from the mediator (.1); review follow-up correspondence with the mediator re same and attendance of particular insurers (.1);	0.20	\$125.00
5/4/2023	Jesse Bair	Review E. Caldie correspondence re non-monetary settlement issues (.1);	0.10	\$62.50
5/8/2023	Timothy Burns	Conference with J. Bair re insurance adversary proceeding issues (.1); participate in supplemental conference with J. Bair re insurance mediation strategy (.3); participate in call with R. Kugler and J. Bair re insurance mediation and litigation strategy (.6);	1.00	\$700.00
5/8/2023	Jesse Bair	Participate in conference with T. Burns re insurance adversary proceeding issues (.1); participate in supplemental conference with T. Burns re insurance mediation strategy (.3); participate in call with R. Kugler and T. Burns re insurance mediation and litigation strategy (.6);	1.00	\$625.00
5/9/2023	Jesse Bair	Analysis re potential next-steps for insurance litigation and settlement strategy (.3); provide instructions to L. Au re preparing presentation summarizing same (.2);	0.50	\$312.50

5/9/2023	Leakhena Au	Draft PowerPoint presentation re insurance litigation and settlement strategy (3.1);	3.10	\$1,302.00
5/10/2023	Jesse Bair	Review and edit BB's fourth interim fee application (.6);	0.60	\$375.00
5/10/2023	Leakhena Au	Continue drafting PowerPoint presentation re insurance litigation and settlement strategy (1.5);	1.50	\$630.00
5/11/2023	Jesse Bair	Correspondence with L. Kugler re BB's fourth interim fee application (.1);	0.10	\$62.50
5/15/2023	Timothy Burns	Participate in conferences with J. Bair re insurance case strategy (.3); participate in call with state court counsel and J. Bair re case insurance strategy (.1); participate in call with state court counsel and J. Bair re Arrowood strategy (.3); additional analysis re Arrowood strategy issues (.1);	0.80	\$560.00
5/15/2023	Jesse Bair	Participate in conferences with T. Burns re insurance case strategy (.3);	0.30	\$187.50
5/15/2023	Jesse Bair	Participate in call with state court counsel and T. Burns re case insurance strategy (.1);	0.10	\$62.50
5/15/2023	Jesse Bair	Analysis regarding potential Arrowood project (.1);	0.10	\$62.50
5/15/2023	Jesse Bair	Participate in conference with T. Burns and state court counsel re Arrowood strategy (.3);	0.30	\$187.50
5/16/2023	Jesse Bair	Correspondence with the mediator re call to discuss insurance issues (.1);	0.10	\$62.50
5/16/2023	Jesse Bair	Review correspondence with L. Kugler re June mediation sessions (.1);	0.10	\$62.50
5/16/2023	Jesse Bair	Participate in conference with T. Burns and L. Au re Arrowood strategy (.1);	0.10	\$62.50
5/16/2023	Leakhena Au	Participate in conference with T. Burns and J. Bair re Arrowood strategy (.1);	0.10	\$42.00
5/16/2023	Timothy Burns	Met with J. Bair and L. Au re Arrowood strategy and assignments (.1);	0.10	\$70.00
5/17/2023	Timothy Burns	Prepare for call with the mediator re case insurance issues (.3); participate in call with the mediator and J. Bair re case insurance issues (.7);	1.00	\$700.00
5/17/2023	Jesse Bair	Review and edit draft PowerPoint presentation re potential insurance litigation and settlement strategies(.6);	0.60	\$375.00
5/17/2023	Jesse Bair	Prepare for call with mediator re case insurance issues (.1);	0.10	\$62.50
5/17/2023	Jesse Bair	Participate in call with the mediator and T. Burns re case insurance issues (.7);	0.70	\$437.50
5/23/2023	Jesse Bair	Correspondence with R. Kugler re call to discuss insurance developments (.1);	0.10	\$62.50
5/23/2023	Timothy Burns	Review correspondence with Stinson and J. Bair re insurance case strategy meeting (.1); additional analysis of insurance litigation strategies in connection with same (.1);	0.20	\$140.00
5/24/2023	Jesse Bair	Review notice of hearing re professional fee applications and correspond with L. Kugler re same (.1);	0.10	\$62.50

5/25/2023	Timothy Burns	Prepare for call with Stinson team re case insurance strategy (.1); participate in call with Stinson team and J. Bair re same (.4);	0.50	\$350.00
5/25/2023	Jesse Bair	Prepare for call with Stinson team re case insurance strategy (.1); participate in call with Stinson team and T. Burns re same (.4);	0.50	\$312.50
5/26/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and next-steps (.1); correspondence with J. Murray re call to discuss insurance issues (.1);	0.20	\$125.00
5/26/2023	Timothy Burns	Conference with J. Bair re case insurance strategy (.1); review correspondence re call with Diocese to discuss same (.1);	0.20	\$140.00
5/30/2023	Timothy Burns	Participate in call with J. Bair and state court counsel re case insurance developments (.1);	0.10	\$70.00
5/30/2023	Jesse Bair	Participate in call with T. Burns and state court counsel re case insurance developments (.1);	0.10	\$62.50
5/31/2023	Timothy Burns	Review correspondence from S. Donato re mediation and insurance (.1); met with J. Bair re same (.1); review correspondence with R. Kugler re same (.1);	0.30	\$210.00
5/31/2023	Jesse Bair	Correspondence with the Diocese re call to discuss case insurance issues (.1);	0.10	\$62.50
5/31/2023	Jesse Bair	Correspondence with R. Kugler re insurance case developments (.1);	0.10	\$62.50
<b>Total Hours and Fees</b>			<b>15.70</b>	<b>\$9,117.50</b>

**Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Brian Cawley	0.10	\$420.00	\$42.00
Jesse Bair	6.30	\$625.00	\$3,937.50
Leakhena Au	4.80	\$420.00	\$2,016.00
Nathan Kuenzi	0.10	\$420.00	\$42.00
Timothy Burns	4.40	\$700.00	\$3,080.00

**Total Due This Invoice: \$9,117.50**